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Attorneys for Plaintiff  
WEBCOR CONSTRUCTION, INC. dba  
WEBCOR BUILDERS

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA-SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA for the Use and  
Benefit of WEBCOR CONSTRUCTION, INC. dba  
WEBCOR BUILDERS, and WEBCOR  
CONSTRUCTION, INC. dba WEBCOR  
BUILDERS,

Plaintiffs,

vs.

DICK/MORGANTI, a joint venture, DICK  
CORPORATION, THE MORGANTI GROUP,  
AMERICAN CASUALTY COMPANY OF  
READING, PA, NATIONAL UNION FIRE  
INSURANCE COMPANY OF PITTSBURGH, PA,  
and DOES 1 through 10, inclusive,

Defendants.

Case No.: 3:07-CV-02564-CRB

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME TO  
FILE ANSWER**

Before: Hon. Charles R. Breyer

1 AND RELATED COUNTER-CLAIMS AND  
2 THIRD PARTY CLAIMS.

3  
4 Pursuant to Civil Rule 6-2, Defendants, Counter-Claimants and Third Party Complainants  
5 DICK/MORGANTI, DICK CORPORATION and THE MORGANTI GROUP (together, "D/M")  
6 and Plaintiff WEBCOR CONSTRUCTION, INC. dba WEBCOR BUILDERS ("Webcor") hereby  
7 stipulate and agree that the deadline for D/M to file an answer to Webcor's complaint, as well as  
8 the time for D/M to file a counterclaim, if any, be extended for one month, from August 29, 2008  
9 to September 29, 2008.

10 There have been prior time extensions in this case, including time extensions in connection  
11 with case management conferences, but no prior time extensions in connection with this particular  
12 deadline.

13 A declaration in support of this stipulated request is attached.

14  
15 Dated: August 28, 2008

THELEN REID BROWN RAYSMAN & STEINER LLP

16 /s/

17 By \_\_\_\_\_

18 John W. Ralls  
19 Attorneys for Defendants, Counter-Claimants and  
20 Third Party Complainants DICK/MORGANTI,  
21 DICK CORPORATION, THE MORGANTI  
22 GROUP, AMERICAN CASUALTY COMPANY OF  
23 READING, PA, and NATIONAL UNION FIRE  
24 INSURANCE COMPANY OF PITTSBURGH, PA

25 Dated: August 28, 2008

BOWLES & VERNA LLP

26 /s/

27 By \_\_\_\_\_

28 Kenneth G. Jones  
Attorneys for Plaintiff WEBCOR  
CONSTRUCTION, INC. dba WEBCOR BUILDERS

**[PROPOSED] ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2008

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Hon. Charles R. Breyer  
United States District Court  
Northern District of California

**DECLARATION OF JOHN W. RALLS**

I, John W. Ralls, declare:

1. I am an attorney-at-law, a partner with Thelen Reid Brown Raysman & Steiner LLP and counsel of record for Defendants, Counter-Claimants and Third Party Complainants DICK/MORGANTI, DICK CORPORATION, THE MORGANTI GROUP, AMERICAN CASUALTY COMPANY OF READING, PA and NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA.

2. Over the last few weeks, I have had a number of discussions with counsel for Webcor, Kenneth Jones and Richard Bowles. We have agreed on various steps in an effort to push the claims pending against the GSA forward. As part of these discussions Mr. Jones and I recently agreed that we should defer efforts on formal pleadings in this action for a time, so that we can focus on efforts in connection with the claims pending against the GSA.

3. The time extension requested herein was proposed and agreed to by the parties as part of these discussions, and will have no impact on the progress of the case schedule.

I declare under penalty of perjury under the law of the United States that the foregoing is true and correct.

Executed on August 28, 2008, in San Francisco, California.

/s/ John W. Ralls  
John W. Ralls